

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
	:	
Jerome Donald Boyd,	:	Case No. 19-24636-GLT
Debtor	:	
_____	:	Chapter 13
	:	
Jerome Donald Boyd,	:	Claim. No. 3
Movant	:	
	:	
v.	:	Hearing Date:
	:	
	:	
Nationstar Mortgage LLC d/b/a Mr. Cooper and	:	
Ronda Winnecour, Trustee	:	
Respondents	:	
_____	:	

DECLARATION

I, Albert G. Reese Jr., Esquire, attorney for the above-referenced Debtor, hereby submit this formal written Declaration that the existing Chapter 13 Plan is sufficient to fund the plan with the modified debt for the following reason:

Pursuant to Nationstar Mortgage LLC d/b/a Mr. Cooper's Notice of Mortgage Payment Change filed on May 29, 2024, the Debtor's current escrow payment for account number ending in **2205** is **\$782.87**. The new escrow payment is **\$817.86**. The current mortgage payment is **\$2,144.15**. The new mortgage payment is **\$2,179.14** effective July 1, 2024. The Debtor will pay the difference directly to the Chapter 13 Trustee.

Dated: **May 31, 2024**

Respectfully submitted by:
/s/ Jerome Donald Boyd
Jerome Donald Boyd

Dated: **May 31, 2024**

Respectfully submitted by:
/s/ Albert G. Reese, Jr., Esquire
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